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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No. 3:21-cr-00062-JMK-DMS
)
Plaintiff,) <u>COUNT 1:</u>
) CYBERSTALKING
vs.) Vio. of 18 U.S.C. §§ 2261A(2)(A),
) (B), and 2261(b)(6)
ROLANDO HERNANDEZ-)
ZAMORA,)
)
Defendant.)
_____)

INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning in or about May 2016, the exact date being unknown, and continuing through May 29, 2020, within the District of Alaska and elsewhere, with the intent to kill,

injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, the defendant, ROLANDO HERNANDEZ-ZAMORA, used any interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, to knowingly engage in a course of conduct that placed that person in reasonable fear of the death of and serious bodily injury to that person, her child, and parents; and knowingly caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person, her child, and parents.

All of which is in violation of 18 U.S.C. §§ 2261A(2)(A), (B), and 2261(b)(6).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Jonas M. Walker
JONAS M. WALKER
Assistant U.S. Attorney
United States of America

s/ E. Bryan Wilson
E. BRYAN WILSON
Acting United States Attorney
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DATE: May 18, 2021